

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

In re Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/FLN)

This Document Relates to All Actions

**DECLARATION OF MICHAEL A.
SACCHET IN SUPPORT OF
PLAINTIFFS' RESPONSE TO
DEFENDANT 3M COMPANY'S
MOTION FOR LEAVE TO TAKE
ADDITIONAL DEPOSITIONS AND
TO CONTINUE THE DEPOSITION
OF DR. SCOTT AUGUSTINE**

DECLARATION OF MICHAEL A. SACCHET

Michael Sacchet, being first duly sworn, deposes and declares:

1. My name is Michael A. Sacchet and I am an attorney at the Ciresi Conlin LLP law firm. I represent Plaintiffs in the above-captioned matter.
2. Attached hereto as Exhibit A is a true and correct copy of an excerpt of the Deposition of Dr. Scott Augustine.
3. Attached hereto as Exhibit B is a true and correct copy of an excerpt of the deposition of Dr. Paul McGovern.
4. Attached hereto as Exhibit C is a true and correct copy of an excerpt of the Deposition of Professor Christopher Nachtsheim.
5. Attached hereto as Exhibit D is a true and correct copy of an excerpt of the Deposition of Dr. Kumar Belani.
6. Attached hereto as Exhibit E is a true and correct copy of an excerpt of the Deposition of Dr. Scott Augustine.
7. Attached hereto as Exhibit F is a true and correct copy of the March 17, 2017 letter from 3M's counsel to Plaintiffs' counsel.

I declare under penalty of perjury that the foregoing is true and correct. Executed
this 11th day of May, 2017.

/s/ Michael A. Sacchet
Michael A. Sacchet (MN #0395817)
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